

COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

)

COLONIAL GAS COMPANY ) D.T.E. 98-68

DEMAND SIDE MANAGEMENT (DSM) )

PROGRAMS )

)

JOINT MOTION FOR APPROVAL OF RESTATED SETTLEMENT AGREEMENT

Pursuant to 220 CMR § 1.04(5), Colonial Gas Company ("Colonial"), the National Consumer Law Center, Inc. ("NCLC"), representing Community Teamwork, et al., and the Department of Public Utilities Settlement Intervention Staff ("SIS") hereby jointly move for approval of the Restated Settlement Agreement submitted herewith which seeks to address all issues in this proceeding. In connection therewith, the parties also jointly move to have Colonial's original July 7, 1998 filing (with accompanying exhibits A through C), Colonial's responses to all information requests (which responses were filed on August 20, 1998 and August 26, 1998 — AG-1-1 through AG-1-21) and the responses of Colonial and the Attorney General ("AG") to the Hearing Officer's October 1, 1998 request for an interpretation of G.L. c. 25, §19, moved into the evidentiary record in this proceeding. The AG does not oppose the Restated Settlement Agreement and the motions herein.

The Restated Settlement Agreement submitted herewith replaces and supersedes in all respects the Settlement Agreement earlier submitted on November 27, 1998 (it is the same as that earlier Settlement Agreement except it is accompanied by this Motion). The parties respectfully request that the Department act on this Motion as expeditiously as possible. The parties are available to address any questions the Department may have about the terms of the submitted Restated Settlement Agreement.

COLONIAL GAS COMPANY

By:

Timothy A. Clark, General Counsel

Bruce B. Glendening, Regulatory Counsel

40 Market Street

Lowell, MA 01852

DEPARTMENT OF PUBLIC UTILITIES NATIONAL CONSUMER LAW CENTER

SETTLEMENT INTERVENTION STAFF REPRESENTING COMMUNITY

TEAMWORK, ET AL.,

By: By:

Noelle Byrnes, Esq. Jerrold Oppenheim, Esq.

100 Cambridge Street 18 Tremont Street

Boston, MA 02202 Boston, MA 02108

Dated: December 8, 1998